



DLA Piper LLP (US)
1251 Avenue of the Americas
New York, New York 10020-1104
T 212.335.4500
F 212.335.4501
W www.dlapiper.com

JOHN J. CLARKE, JR.
john.clarke@us.dlapiper.com
T 212.335.4920

March 6, 2025

Because these proposed redactions are consistent with the redactions previously authorized by the Court, ECF No. 21, the motion to seal is GRANTED. The Clerk of Court is directed to terminate ECF No. 50.

By ECF

Hon. Jesse M. Furman
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

SO ORDERED.

A handwritten signature in black ink, appearing to read 'John J. Clarke, Jr.'

Re: UMB Bank, N.A. v. Bristol-Myers Squibb Company, et al., No. 24 Civ. 8668 (JMF) March 7, 2025

Dear Judge Furman:

We represent defendant Bristol-Myers Squibb Company (“BMS”) in this action. In accordance with the Court’s Individual Rules and Practices in Civil Cases, I am writing to respectfully request leave of the Court to file under seal the memorandum of law in support of BMS’s motion to dismiss this action for lack of subject matter jurisdiction and for failure to state a claim as well as some of the documents being filed today in support of BMS’s motion.

Sealing of the unredacted brief is warranted to protect very limited excerpts setting forth personal confidential information of beneficial owners of the CVRs in the memorandum of law. The confidential information was obtained from exhibits to the complaint that were filed under seal by plaintiff UMB Bank N.A. (“UMB”). In an order entered in connection with BMS’s motion to dismiss UMB’s initial complaint in this action, the Court authorized the identical information to be filed under seal. [ECF No. 46].

BMS separately is filing on the public docket a redacted version of the memorandum of law in support of the motion to dismiss. The limited redactions shield from public view any discussion of the confidential information referred to above. We are submitting to the Court under seal, and serving on counsel for the other parties, an unredacted copy of the memorandum of law in which the redactions have been highlighted.

Of Counsel:

Jessica A. Masella

Respectfully submitted,

/s/ John J. Clarke, Jr.

John J. Clarke, Jr.